

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

LINDA LOUISE CULKIN,

Defendant.

Criminal Case No. 12-CR-10080-GAO

JOINT INITIAL STATUS REPORT

Pursuant to Local Rule 116.5, the parties have conferred and submit this joint initial status report:

1. The United States provided automatic discovery within the time provided by the local rules. Defendant has not made any additional discovery requests, but may do so after reviewing the automatic discovery.

2. The United States will work with Defendant to provide discovery in addition to that required by the local rules.

3. Defendant requires additional time to review the discovery and further meet with Defendant to evaluate whether and when to request additional discovery.

4. The United States has provided Defense counsel a proposed protective order that would restrict the dissemination of information concerning the victims. Defense counsel will discuss this with Defendant.

5. Defendant must review the discovery, meet further with Defendant, and review the case file before she can identify whether any pretrial motions will be necessary and on what

schedule they could be filed.

6. Because the parties are unclear on whether a trial will be necessary or which types of experts would be called, the parties ask to defer scheduling expert witness disclosures until a future status conference.

7. The parties believe that the Court has excluded all of the time through October 10, 2012, and ask the Court to exclude the next period from that date to the date of the next status conference.

8. The parties request that an interim status conference be scheduled during the first week of December.

9. Defense counsel has had Defendant examined by a mental health expert so that she can evaluate whether further motions should be filed regarding Defendant's mental health and/or bail review.

10. The United States is in the process of determining whether some of the evidence required for trial is being held by law enforcement officers in another country. The United States is also in the process of determining which witnesses from that country would be necessary witnesses at trial. The resulting MLAT and letters rogatory may require a delay in setting a trial schedule.

Respectfully submitted,

Carmen M. Ortiz
United States Attorney

Inga Parsons, Esq.

By: /s/ Scott L. Garland
Scott L. Garland
Assistant U.S. Attorney

/s/ Inga Parsons
Inga Parsons
Counsel for Defendant Culkin

CERTIFICATE OF SERVICE

I hereby certify that this document will be filed through the ECF system and therefore will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Scott L. Garland
Scott L. Garland
Assistant United States Attorney

Date: October 4, 2012